

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NORTHEAST ORGANIC FARMING  
ASSOCIATION OF NEW YORK,  
NATURAL RESOURCES DEFENSE  
COUNCIL, and ENVIRONMENTAL  
WORKING GROUP,

Plaintiffs,

v.

U.S. DEPARTMENT OF AGRICULTURE,

Defendant.

Civil Action No. 1:25-cv-01529  
(MMG)

**DECLARATION OF CORINNE HANSCH**

I, Corinne Hansh, hereby declare and state as follows:

1. I am an organic farmer and owner of Lovin' Mama Farm in Amsterdam, New York, and a member of the Northeast Organic Farming Association of New York ("NOFA-NY"). I became a NOFA-NY member in 2016. I am over the age of eighteen. I have personal knowledge of the facts stated in this declaration, and, if called to testify, I could and would competently do so under oath.

2. Lovin' Mama Farm is a certified organic farm based in the Mohawk-Hudson Valley region of New York. On three acres, my family and I grow hundreds of varieties of specialty vegetables, herbs, and flowers, and have a greenhouse full of microgreens like arugula, basil, and purple cabbage. We sell our freshly picked produce directly to consumers at five local farmers' markets and operate two Community Supported Agriculture programs, through which local customers receive boxes of fresh produce and flowers.

3. I came to organic farming because I wanted myself, my small kids, and my community to have access to nutrient-dense, non-toxic produce. I also wanted a solution-oriented career that allows me to build environmental and community health while living a life closely connected to the land. I am a land steward first and foremost, and that is why I use the most ecologically sound methods on my farm.

4. Lovin' Mama Farm is a no-till farm, meaning that we grow crops without disturbing the soil. Keeping the soil intact is key to our success. It has allowed us to build the amount of organic matter in our soil from 5 percent to 12 percent over the past eight years. Such healthy soil is very resilient to weather extremes because it has increased water-holding capacity, so it protects crops during droughts and floods. No-till farming also helps our farm serve as a climate solution. Unlike conventional tilling, which releases carbon each time the soil is disturbed, no-till farming keeps carbon locked beneath the surface of the soil. It also allows us to produce high-quality produce, which in turn allows us to pay ourselves and our employees a living wage.

5. Our farm exemplifies how organic farming supports the environment and local communities. We grow an incredibly diverse set of vegetables and flowers, which creates habitat for beneficial insects, birds, and amphibians, and eliminates the need for unnatural and dangerous forms of pest control. We also distribute everything we grow locally, bringing healthy food to many community members who wouldn't otherwise be able to access it.

6. Running a small, organic farm like ours is operationally and financially challenging. To help sustain and grow our business, we often rely on government grants and loans, including those provided through USDA programs that support conservation and climate-smart agricultural practices.

7. I have relied on USDA webpages to learn about and apply for USDA funding. Since January 31, 2025, however, some key USDA webpages, including Farm Service Agency (“FSA”) and Farmers.gov webpages, are no longer available. For example, both FSA and Farmers.gov used to publish webpages with information about how to access federal loans to implement climate-smart agricultural practices. These webpages are no longer available on USDA’s websites.

8. It’s essential for me to have access to complete information about USDA funding opportunities now because I’m currently making decisions about how to finance expansions on our farm in the near term. We are currently seeking to expand into a 5-acre field, where we plan to trial no-till practices for field crops such as potatoes, winter squash, and winter storage vegetables. To scale up production, we will need equipment, including a larger tractor that can handle a no-till seed drill and a straw mulcher/shredder. We will also need more perennials plantings, plus more infrastructure, including a barn for equipment and supplies storage, a deer fence, and an additional water system.

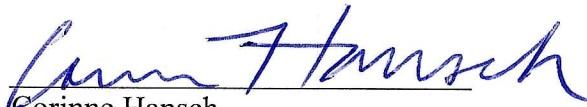
9. We will need to obtain a loan or grant to fund these expansions, and I therefore need accurate, timely, and user-friendly information about federal loan opportunities through USDA. We’ve applied for a state grant to fund these infrastructure advancements, but last year, we applied for the same grant and did not receive an award. If we’re not selected, we’ll need to quickly figure out which USDA farm loan programs can fund our planned expansions. But without access to FSA and Farmers.gov webpages about how to access loans for the types of climate-smart agricultural practices we intend to implement, and equipment purchases we intend to make, it’s much harder for us to make these crucial, short-term financial decisions.

10. Losing access to these webpages has also made it harder for me to mentor first generation organic farmers. As a NOFA-NY member, I serve as a mentor in the Mid-

Atlantic/Northeast Regional Transition to Organic Partnership Program. In that capacity, I mentor farmers who are transitioning to organic growing methods with the goal of seeking organic certification. Access to capital is one of the biggest obstacles for these farmers and they often rely on USDA farm loan programs. It's important for me to have access to complete information about USDA funding opportunities, including digital resources about farm loan program support for climate-smart agricultural practices, as I help my mentees through the challenging transition to organic farming.

11. It's especially harmful to lose access to USDA digital resources given USDA's recent decision to fire hundreds of staff across the country, including at FSA. Our local FSA office has long been understaffed, which has made it difficult to access USDA funding opportunities in person or over the phone. Now that FSA will have fewer hands on deck at its local offices, it's particularly harmful to deprive farmers like me of digital resources they need to navigate complex USDA programs.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct. Executed this 13 day of March, 2025.

  
Corinne Hansch